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Reported by Elaine A. Thies, RPR

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12 no information from Ms. Terry in any way about her
13 going into labor and delivering until he heard a
14 baby's cry?

15 A That's correct.

16 Q I want you to assume that there is a legal claim in
17 this case by Ms. Terry of a failure to train
18 correctional officers on how to respond to medical
19 emergencies, that Armor failed to do that as a
20 matter of course. Can you hold that assumption in
21 your mind?

22 A I do.

23 Q From your training and experience and your many
24 years with the Milwaukee County Sheriff's Office
25 and your different levels of supervision and

5

1 responsibilities, if the facts are as Ms. Terry
2 alleges, that is, that she pounded on the window,
3 screamed and yelled for help for hours, and the
4 only response from Officer Wenzel was a dismissive
5 wave of the hand, do you see that as an issue of
6 training with respect to response to medical
7 emergencies?

8 MS. KLEINHAUS: I'll just object to
9 foundation. Apparently there's another witness
10 being disclosed on training. You can answer.

11 MR. RUSSART: I didn't disclose anybody.
12 I'm asking the witness that's here to testify.

13 THE WITNESS: So if I accept the
14 hypothetical that over an extended period of time
15 an inmate in a cell, specifically an SMU cell, were
16 screaming and pounding and an officer were ignoring

17 that, would that be a training issue; no, that
18 would be a failure to perform issue if that
19 circumstance occurred.

20 MR. RUSSART: That's all that I have.

21 MS. KLEINHAUS: Are you good?

22 MR. KNOTT: Nothing.

23 MS. KLEINHAUS: Okay. Thanks.

24 (The proceedings concluded at 12:31 p.m.)

25 (No exhibits marked.)

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1 STATE OF WISCONSIN)
2 MILWAUKEE COUNTY) SS.
3

4 I, Elaine A. Thies, RPR and Notary
5 Public in and for the State of Wisconsin, do hereby
6 certify that the preceding excerpt from deposition
7 was recorded by me and reduced to writing under my
8 personal direction.

9 I further certify that said excerpt
10 from deposition was taken at LEIB KNOTT GAYNOR LLC,
11 219 North Milwaukee Street, Suite 710, Milwaukee,
12 Wisconsin, on the 29th day of August, 2018.

13 I further certify that I am not a
14 relative or employee or attorney or counsel of any of
15 the parties, or a relative or employee of such
16 attorney or counsel, or financially interested
17 directly or indirectly in this action.

18 In witness whereof, I have hereunto
19 set my hand and affixed my seal of office on this
20 29th day of August, 2018.

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ELAINE A. THIES - Notary Public
In and for the State of Wisconsin

24

My commission expires 11-4-21.

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